



10 April 2020

Heather Mason
Environmental Administrator
2600 Blair Stone Road, Mail Station 2500
Tallahassee, FL 32399
(850) 245-8480

Via Email: Heather.Mason@dep.state.fl.us

Re: USACE Regional General Permits and the proposed State 404 Program Rule

Ms. Mason,

The St. Joe Company is a signatory on three binding Ecosystem Management Agreements with the State, entered into pursuant to the authority provided by Sections 403.0752 (F.S.). As stated in Section I of the agreements, "The ecosystem management process established herein coordinates the regulatory responsibilities of the DEP and the U.S. Army Corps of Engineers (USACE) with the interests of the business community, private landowners and the public, as partners in a streamlined and effective program to protect the environment and to provide net ecosystem benefits (403.0752(1), F.S.)."

Pursuant to Section 404 of the Clean Water Act (33 U.S.C. 1344) Regional General Permit SAI-86, Regional General Permit SAI-105, and Regional General Permit SAI-114 were developed as the tandem federal regulatory instruments to the three Ecosystem Management Agreements referenced above.

The St. Joe Company requests that the Department add USACE Regional General Permits SAI-86, SAI-105, and SAI-114 to the proposed State 404 Program Rule. Copies of these are included as attachments. We also request the Department communicate to us how these three Regional General Permits may be impacted by the proposed State 404 Program Rule, and specifically how it will affect the aspirational but upheld 60-90 day timeframe the USACE has consistently delivered for Individual Project Approvals (IPA) deemed complete, under these general permit mechanisms.

Please let me know if you have any questions regarding this request and we look forward to your prompt reply, as we understand time is of the essence for the public comment period.

Sincerely,

A handwritten signature in cursive script that reads "Catherine McCloy".

Catherine McCloy, AICP
Director of Planning and Development
The St. Joe Company

Cc/

Tonya McHale, FDEP
Elizabeth Orr, FDEP
Jorge Gonzalez, St. Joe
Amy Douglas, Icarus

enc/

Attachment A: RGP-SAJ86
Attachment B: RGP-SAJ105
Attachment C: RGP-SAJ114